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VIA ECF

March 21, 2022

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 1007

Re: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570

Dear Judge Netburn:

Dubai Islamic Bank (“DIB”) and Plaintiffs with claims against DIB (“Plaintiffs”), jointly write to respectfully request that the Court adjourn the deadline for Plaintiffs’ response to DIB’s personal jurisdiction motion (ECF No. 7419), which currently is due on March 22, 2022. This request would extend the Court’s previous extension, granted at ECF No. 7707. The parties anticipate this will be the last extension request.

As the parties advised the Court on February 26, 2022 (ECF No. 7704), DIB and Plaintiffs are engaged in active discussions that they expect will obviate the need for the Court to decide the issues raised by DIB’s motion. Plaintiffs provided responses to a relevant draft document last week. Additional time is needed to conclude the parties’ discussions.

For the foregoing reasons, DIB and Plaintiffs respectfully request that the Court adjourn the deadline one more time for Plaintiffs to respond to DIB’s motion from March 22, 2022 to April 29, 2022. In light of the progress made to date, the parties believe that it is in the interests of justice and judicial economy to permit the discussions to conclude. In the unlikely event that the parties’ discussions do not obviate the need for a response to DIB’s motion, the parties will report back to the Court as soon as the discussions conclude. DIB and Plaintiffs thank Your Honor in advance for the Court’s attention to this matter.

Respectfully Submitted,
/s/ Steven T. Cottreau
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cc: All MDL Counsel of Record (via ECF)